

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

§

§

v.

§

CRIMINAL NO. 4:23-cr-00165-1

§

§

DANIEL BYRD

§

§

**DEFENDANT'S AMENDED UNOPPOSED MOTION FOR CONTINUANCE AND  
RESET DEADLINES**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Daniel Byrd, who respectfully requests this Honorable Court to enter an order continuing this cause and in support thereof would show as follows:

1. The United States Government is unopposed to this motion.
2. The Defendant is seeking an extension on the objections deadline for the PSI and following deadlines.
3. The case currently has a scheduled PSI Objection deadline on February 10, 2025.
4. The PSI contained evidence that the Defense Counsel wanted to review and counsel and the agent for the Government have not yet had time to meet to review the relevant evidence from the PSI. This meeting should be held February 20, 2025.
5. The Defendant has filed a waiver for a speedy trial.
6. This motion is not made for delay.

WHEREFORE, PREMISES CONSIDERED, Defendant requests that this Honorable Court grant this motion and reset the PSI Objection deadline for 30 days or whichever date this Honorable Court sees fit.

Respectfully submitted,

**PAUL DOYLE & ASSOCIATES, P.C.**

By: /s/ Paul Doyle

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**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 10<sup>th</sup> day of February 2025, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Paul Doyle

Paul Doyle  
Attorney for Daniel Byrd

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that on the 10<sup>th</sup> day of February 2025, counsel spoke the assigned, Assistant United States Attorney, stating that he was unopposed to this motion.

/s/ Trevor Sharon

Trevor Sharon  
Attorney for Daniel Byrd